

EXHIBIT

A

ATTORNEY ID: 010341977

71 North Main Street

Medford, NJ 08055

(609) 953-1200

Attorney for Plaintiff(s) Racquel Rhule

RACQUEL RHULE,	SUPERIOR COURT OF NEW JERSEY LAW DIVISION BURLINGTON COUNTY
PLAINTIFFS,	DOCKET NO.: BUR-L-1900-24
VS.	CIVIL ACTION
MATTHEW J. THOMPSON, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK AND JOHN DOES I-III	SUMMONS
DEFENDANTS	

From The State of New Jersey To The Defendant(s) Named Above: National Railroad Passenger Corporation

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.

/s/ MICHELLE M. SMITH
Clerk of the Superior Court

Dated: February 11, 2025

Name of Defendant to Be Served: National Railroad Passenger Corporation

Address of Defendant to Be Served: 1 Massachusetts Avenue NW
Washington, DC 20001

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
1201 Bacharach Blvd.
Atlantic City, N.J. 08401
Lawyer referral 609-345-3444 Legal Services 609-348-4200

BERGEN COUNTY:

Clerk, Superior Court
Justice Center, 10 Main St. Room 115
Hackensack, NJ 07601-0769
LAWYER REFERRAL 201-488-0044 LEGAL SERVICES 201-487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL 609-261-4862 LEGAL SERVICES 800-496-4570

CAMDEN COUNTY:

Clerk Superior Court, Civil
101 S. Fifth St, Suite 150
Camden, NJ 08103
LAWYER REFERRAL 856-964-4520 LEGAL SERVICES 856-964-2010

CAPE MAY COUNTY:

Central Processing Office
9 N. Main St.
Cape May Court House, NJ 08210
LAWYER REFERRAL 609-463-0313 LEGAL SERVICES 609-465-3001

CUMBERLAND COUNTY:

Clerk Superior Court, Civil Case Management
P.O. Box 10
Bridgeton, N.J. 08302
LAWYER REFERRAL 856-696-5550 LEGAL SERVICES 856-691-0494

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
71 Monument Park, P.O. Box 1262
Freehold, NJ 07728-1262
Lawyer Referral 732-431-5544 Legal Services 732-866-0020

MORRIS COUNTY:

Clerk Superior Court, Civil Division
P.O. Box 910, Washington & Court Sts.
Morristown, NJ 07960-0910
LAWYER REFERRAL 973-267-5882 LEGAL SERVICES 973-285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington St Rm 121, P.O. Box 2191
Toms River, NJ 08754
LAWYER REFERRAL 732-240-3666 LEGAL SERVICES 732-341-2727

PASSAIC COUNTY:

Clerk Superior Court, Civil Division
77 Hamilton St.
Paterson, NJ 07505
LAWYER REFERRAL 973-278-9223 LEGAL SERVICES 973-345-7171

SALEM COUNTY:

Deputy Clerk of the Superior Court
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL 856-935-5629 LEGAL SERVICES 856-451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
465 Dr. Martin Luther King Jr Blvd, Rm 201
Newark, NJ 07102
Lawyer Referral Services 973-622-6204 Legal Services 973-624-4500

GLOUCESTER COUNTY:

Clerk, Superior Court, ATTN: Intake, 1st Floor
1 N. Broad Street
Woodbury, NJ 08096
Lawyer Referral 856-848-4589 LEGAL SERVICES 856-848-5360

HUDSON COUNTY

Deputy Clerk of the Superior Court
583 Newark Ave., 1st Floor
Jersey City, NJ 07306
LAWYER REFERRAL 201-798-2727 LEGAL SERVICES 201-792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior
Civil Division, 65 Park Ave.
Flemington, NJ 08862
LAWYER REFERRAL 908-735-2611 LEGAL SERVICES 908-782-7979

MERCER COUNTY:

Clerk Superior Court, Local Filing Office
175 S. Broad St, PO Box 8068
Trenton, NJ 08650
LAWYER REFFERAL 609-585-6200 LEGAL SERVICES 609-695-6249

MIDDLESEX COUNTY:

Clerk Superior Court
56 Paterson St, PO Box 263
New Brunswick, NJ 08903
LAWYER REGERAL 732-828-0053 LEGAL SERVICES 732-249-7600

SOMERSET COUNTY:

Clerk Superior Court, Civil
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL 908-685-2323 LEGAL SERVICES 908-231-0840

SUSSEX COUNTY:

Clerk Superior Court, Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL 973-267-5882 LEGAL SERVICES 973-383-7400

UNION COUNTY:

Clerk Superior Court, Court House
2 Broad Street, 1st Fl.
Elizabeth, NJ 07207
LAWYER REFERRAL 908-353-4715 LEGAL SERVICES 908-354-4340

WARREN COUNTY:

Clerk Superior Court, Civil
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL 973-267-5882 LEGAL SERVICES 908-475-2010

Robert I. Segal, Esquire
Attorney I.D.: 010341977
W. Robb Graham, Esquire
Attorney I.D.: 034661983
ROBERT I. SEGAL, P.A.
71 North Main Street
Medford, New Jersey 08055
(609) 953-1200
Attorneys for Plaintiff, Racquel Rhule

RACQUEL RHULE

Plaintiff,

v.

**MATTHEW J. THOMPSON, NATIONAL
RAILROAD PASSENGER CORPORATION
d/b/a AMTRAK AND JOHN DOES I-III**

Defendants

**SUPERIOR COURT OF
NEW JERSEY**

LAW DIVISION

BURLINGTON COUNTY

DOCKET NO.:

CIVIL ACTION

**COMPLAINT, JURY DEMAND,
CERTIFICATION PURSUANT TO
RULE 4:5-1, DESIGNATION OF
TRIAL COUNSEL, DEMAND FOR
ANSWERS TO UNIFORM
INTERROGATORIES, DEMAND FOR
JURY TRIAL, NOTICE PURSUANT
TO RULE 1:7-1(b) AND NOTICE OF
OTHER ACTIONS**

The plaintiff, Racquel Rhule, residing at 550 South Dupont Highway, Unit 1J, City of New Castle, County of New Castle, State of Delaware, by way of Complaint against the defendants, says:

FIRST COUNT

1. On or about January 24, 2023, the plaintiff, Racquel Rhule, was the operator of a motor vehicle, owned by Partners for Kids & Families, Inc., which was traveling Southbound on the New Jersey Turnpike, Township of Mount Holly, County of Burlington, State of New Jersey.

2. At the same time and place, the defendant, Matthew J. Thompson, was the operator of a motor vehicle owned by defendant, National Railroad Passenger Corporation d/b/a Amtrak, who was traveling Southbound on the New Jersey Turnpike, Township of Mount Holly, County of Burlington, State of New Jersey.

3. At all times relevant hereto, defendant, Matthew J. Thompson, was acting as the agent, servant and/or employee of defendant, National Railroad Passenger Corporation d/b/a Amtrak, acting within the scope of their authority and agency and with their knowledge, permission and/or consent.

4. A collision occurred with the motor vehicle operated by the defendant, Matthew J. Thompson, and plaintiff, Racquel Rhule.

5. The defendant, Matthew J. Thompson, so negligently and carelessly operated his motor vehicle so as to cause the collision.

6. As a direct and proximate result of the negligence and carelessness of the defendant aforesaid, the plaintiff suffered severe painful bodily injuries, which injuries necessitated her obtaining medical treatment, caused her great pain and suffering, incapacitated her from pursuing her usual employment and other activities, caused economic loss and caused other permanent disabilities that will in the future similarly incapacitate her, cause her great pain and suffering, require future medical treatment, and cause future economic losses.

WHEREFORE, the plaintiff, Raquel Rhule, demands judgment against the defendant, Matthew J. Thompson and National Railroad Passenger Corporation d/b/a Amtrak, for damages, counsel fees, interest and costs of suit.

SECOND COUNT

1. The plaintiff repeats the allegations of all preceding counts of the complaint in their entirety and incorporates same by reference.
2. The defendant, John Doe I, is the fictitious name for an individual driving a vehicle at the time of the accident complained of which is the subject matter of this cause of action.
3. The presently unidentified defendant, John Doe I, so negligently and carelessly operated his motor vehicle so as to cause the accident complained of which is the subject matter of this cause of action.
4. As a direct and proximate result of the negligence and carelessness of the defendant, John Doe I, the plaintiff suffered the injuries and damages complained of herein.

WHEREFORE, plaintiff, Racquel Rhule, demands judgment against John Doe I for damages, counsel fees, interest and costs of suit.

THIRD COUNT

1. The plaintiff repeats the allegations of all preceding counts of the Complaint in their entirety and incorporates same by reference.
2. The defendant, John Doe II, is the fictitious name for an individual or entity, who was the owner of a vehicle at the time of the accident complained of which is the subject matter of this cause of action.
3. At all times relevant hereto, the vehicle owned by the defendant, John Doe II, was being operated by an individual with the permission of the owner, John Doe II.

4. At all times relevant hereto, the vehicle owned by the defendant, John Doe II, was being operated by an individual as his or its agent, servant and/or employee within the scope of said agency or employment.

5. As a direct and proximate result of the negligence and carelessness of the defendant, John Doe II, the plaintiff suffered the injuries and damages complained of herein.

WHEREFORE, plaintiff, Raquel Rhule, demands judgment against John Doe II for damages, counsel fees, interest and costs of suit.

FOURTH COUNT

1. The plaintiff repeats the allegations of all preceding counts of the Complaint in their entirety and incorporates same by reference.

2. The defendant, John Doe III, is the fictitious name for an individual or entity for whom a vehicle was being operated at the time of the accident complained of which is the subject matter of this cause of action.

3. At all times relevant hereto, a vehicle was being operated at the time of the accident complained which is the subject matter of this cause of action on behalf of the defendant, John Doe III, as his or its agent, servant and/or employee within the scope of said agency or employment.

4. As a direct and proximate result of the negligence and carelessness of the defendant, John Doe III, the plaintiff suffered the injuries and damages complained of herein.

WHEREFORE, plaintiff, Racquel Rhule, demands judgment against John Doe III for damages, counsel fees, interest and costs of suit.

JURY DEMAND

The plaintiff, Racquel Rhule, hereby demands a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to N.J.S.A. R.4:25-4, W. Robb Graham, Esquire (Attorney I.D.: 34661983), is hereby designated as trial counsel.

**DEMAND FOR COMPLIANCE WITH
N.J. COURT RULES 1:5-1(a) AND 4:17-4(c)**

TAKE NOTICE the undersigned attorney, counsel for the plaintiff, hereby demands, pursuant to the provisions of R.1:5-1(a) and 4:17-4(a), that each party serving pleadings or interrogatories and receiving responses thereto shall serve copies of all such pleadings, interrogatories, and responses thereto upon the undersigned, and further

TAKE NOTICE that this is a continuing demand.

NOTICE OF OTHER ACTIONS

Robert I. Segal, Esquire, of full age, hereby certifies as follows:

1. The matter in controversy is not the subject of any other action pending any Court or of any Arbitration proceeding.
2. There are no other known parties who should be joined in the action at this time.
3. Pursuant to R.4:21A-1, you are hereby advised that this matter is appropriate for Mandatory Arbitration.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

NOTICE PURSUANT TO RULE 1:7-1(b)

Please take notice that, pursuant to New Jersey Court Rule 1:7-1(b), the plaintiff may suggest to the trier of fact, with respect to any element of damages, that unliquidated damages be calculated on a time unit basis without reference to a specific sum.

ROBERT I. SEGAL, P.A.
ATTORNEYS FOR PLAINTIFF

BY: 

ROBERT I. SEGAL, ESQUIRE

DATED: September 17, 2024

Civil Case Information Statement

Case Details: BURLINGTON | Civil Part Docket# L-001900-24

Case Caption: RHULE RACQUEL VS THOMPSON
MATTHEW

Case Initiation Date: 09/17/2024

Attorney Name: ROBERT I SEGAL

Firm Name: ROBERT I SEGAL

Address: 71 NORTH MAIN STREET

MEDFORD NJ 08055

Phone: 6099531200

Name of Party: PLAINTIFF : Rhule, Racquel

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Racquel Rhule? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/17/2024

Dated

/s/ ROBERT I SEGAL

Signed

BURLINGTON COUNTY
SUPERIOR COURT
49 RANCOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: SEPTEMBER 17, 2024
RE: RHULE RACQUEL VS THOMPSON MATTHEW
DOCKET: BUR L -001900 24

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ERIC G. FIKRY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (609) 288-9500 EXT 38309.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: ROBERT I. SEGAL
ROBERT I SEGAL
71 NORTH MAIN STREET
MEDFORD NJ 08055

ECOURTS

